

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

April 26 2023
Ravi Subramanian, Clerk
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,
v.
WINSTON BURT,
Defendant.

No. **CR 23 - 066 JHC**
INDICTMENT

The Grand Jury charges that:

COUNT 1

(Sex Trafficking of an Adult Female (AF1) by Force, Fraud, and Coercion)

Beginning in or about 2021, and continuing until on or about November 5, 2022, in King County, within the Western District of Washington, and elsewhere, WINSTON BURT did, in and affecting interstate commerce, knowingly recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, an adult female, AF1, knowing and with reckless disregard of the fact that force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause AF1 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(1).

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**(Transportation of an Adult Female (AF1) for the Purpose of Prostitution Through
Coercion and Enticement)**

In or about October 2022, in King County, within the Western District of Washington, and elsewhere, WINSTON BURT did knowingly persuade, induce, entice, and coerce an adult female, AF1, to travel in interstate commerce, specifically, from the State of California to the State of Washington, to engage in prostitution and any sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 2422(a) and 2.

COUNT 3

(Unlawful Possession of a Firearm)

On or about October 27, 2022, in King County, within the Western District of Washington, WINSTON BURT, knowing he had been convicted of the following crime punishable by imprisonment for a term exceeding one year: *Pandering*, in cause number 16CR-057098, in the Superior Court of San Bernardino, California, on or about August 15, 2017, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that is, a FN 5.7mm pistol, which had been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 4

(Unlawful Possession of a Firearm)

On or about November 6, 2022, in King County,, within the Western District of Washington, WINSTON BURT, knowing he had been convicted of the following crime punishable by imprisonment for a term exceeding one year: *Pandering*, in cause number 16CR-057098, in the Superior Court of San Bernardino, California, on or about August 15, 2017, did knowingly possess, in and affecting interstate and foreign commerce, a

1 | firearm, that is, a Glock 27 .40 caliber handgun bearing serial number ACWD881, which had
2 | been shipped and transported in interstate and foreign commerce.

3 | All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

4 | **FORFEITURE ALLEGATION**

5 | The allegations in Counts 1 through 4 of this Indictment are hereby realleged and
6 | incorporated by reference herein for the purpose of alleging forfeiture.

7 | Upon conviction of the offense charged in Count 1, WINSTON BURT shall
8 | forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d),
9 | any property that constitutes or is derived from proceeds of the offense, as well as any
10 | property involved in, used, or intended to be used to commit or facilitate commission of
11 | the offense. Such property includes, but is not limited to, a judgment for a sum of money
12 | in the amount of proceeds WINSTON BURT obtained as a result of the offense as well as
13 | the following property seized from WINSTON BURT's person, residence, and vehicle:

- 14 | a. \$20,090.00 in United States currency;
- 15 | b. \$724.00 in United States currency;
- 16 | c. \$3,350.00 in United States currency;
- 17 | d. \$500.00 in United States currency;
- 18 | e. one Audemars Piguet watch encrusted with diamonds;
- 19 | f. one 14k white gold necklace encrusted with 1,616 round brilliant
20 | diamonds;
- 21 | g. one 14k white gold ring encrusted with 339 round brilliant diamonds;
- 22 | h. one FN 5.7mm pistol and any associated ammunition; and
- 23 | i. one Glock 27 .40 caliber handgun bearing serial number ACWD881 and
24 | any associated ammunition.

25 | Upon conviction of the offense charged in Count 2, WINSTON BURT shall
26 | forfeit to the United States, pursuant to Title 18, United States Code, Section 2428(a) any
27 | property that constitutes or is derived from proceeds of the offense, as well as any

1 property used or intended to be used to commit or facilitate the offense. Such property
2 includes, but is not limited to, a judgment for a sum of money in the amount of proceeds
3 WINSTON BURT obtained as a result of the offense as well as the following property
4 seized from WINSTON BURT's person, residence, and vehicle:

- 5 a. \$20,090.00 in United States currency;
- 6 b. \$724.00 in United States currency;
- 7 c. \$3,350.00 in United States currency;
- 8 d. \$500.00 in United States currency;
- 9 e. one Audemars Piguet watch encrusted with diamonds;
- 10 f. one 14k white gold necklace encrusted with 1,616 round brilliant diamonds;
- 11 g. one 14k white gold ring encrusted with 339 round brilliant diamonds;
- 12 h. one FN 5.7mm pistol and any associated ammunition; and
- 13 i. one Glock 27 .40 caliber handgun bearing serial number ACWD881 and any
14 associated ammunition.

15 Upon conviction of either offense charged in Counts 3 and 4, WINSTON BURT,
16 shall forfeit to the United States, pursuant to Title 18, United States Code, Section
17 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any firearms and
18 associated ammunition involved in the offense. Such property includes, but is not limited
19 to:

- 20 a. one 14k white gold ring encrusted with 339 round brilliant diamonds;
- 21 b. one FN 5.7mm pistol and any associated ammunition; and
- 22 c. one Glock 27 .40 caliber handgun bearing serial number ACWD881 and
23 any associated ammunition.

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1 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
2 any act or omission of the defendant,

- 3 a. cannot be located upon the exercise of due diligence;
4 b. has been transferred or sold to, or deposited with, a third party;
5 c. has been placed beyond the jurisdiction of the Court;
6 d. has been substantially diminished in value; or,
7 e. has been commingled with other property which cannot be divided
8 without difficulty,

9 it is the intent of the United States to seek the forfeiture of any other property of the
10 defendant, up to the value of the above-described forfeitable property, pursuant to Title
11 21, United States Code, Section 853(p).

12
13 A TRUE BILL: '

14
15 DATED: 4/26/23

16 *Signature of Foreperson redacted pursuant*
17 *to the policy of the Judicial Conference of*
18 *the United States.*

19 _____
20 FOREPERSON

21 Catherine L. Crisham
22 NICHOLAS W. BROWN
23 United States Attorney

24 Catherine L. Crisham
25 TODD GREENBERG
26 Assistant United States Attorney

27 Catherine L. Crisham
 CATHERINE L. CRISHAM
 Assistant United States Attorney